

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

LUZ CARMARIE RODRIGUEZ FIGUEROA

DEBTOR

CASE NO. 19-05439/EAG

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER  
RE: AUTHORIZATION TO USE OF FUNDS FROM 2023 TAX REFUND**

TO THE HONORABLE COURT:

**NOW COMES, LUZ CARMARIE RODRIGUEZ FIGUEROA**, Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor's confirmed Plan dated November 8, 2019, provides that the Debtor's tax refund will be paid into the Plan. See: Docket No 14.

2. The Debtor received the 2023 tax refund in the sum of \$2,376.00. Attached is copy of bank e-statement, which reflects the direct deposit of the 2023 tax refund on February 23, 2024, issued by the Puerto Rico Treasury Department.

3. The Debtor respectfully submits to the Court that she needs to use these funds to pay for: new refrigerator, new stove (actual refrigerator and stove is broken) and new car tires. Attached is copy of estimates/invoices.

4. The Debtor needs to use the funds from the 2023 "tax refund" to pay for this reasonable expense. Furthermore, the Debtor is living within a very "tight" budget which barely covers his living expenses and a Plan payment of \$188.00.

5. Based on the above-stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds for this expense.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2023 tax refund by the Debtor in the above captioned case.

**NOTICE:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor Luz Carmarie Rodriguez Figueroa, to the address of record: Bo Palo Seco Buzon 207, Maunabo PR 00707.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 4<sup>th</sup> day of March, 2024.

**/s/Roberto Figueroa Carrasquillo**  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
USDC 203614  
ATTORNEY FOR PETITIONER  
PO BOX 186  
CAGUAS PR 00726-0186  
TEL 787-744-7699/ 787-963-7699  
EMAIL: [rfc@rfigueroalaw.com](mailto:rfc@rfigueroalaw.com)





WESTERN AUTO GUAYAMA #01 FIPS  
Road 3 KM 134.6 Veterano Avenue  
Guayama, PR 00784  
(787)864-3488

**WORKORDER 0046223**

Scan to RESUME transaction



\*R815140046223\*

Vehicle 1996 TOYOTA RAV4

Color \_\_\_\_\_

New Tire Location Tag # \_\_\_\_\_ VIN \_\_\_\_\_

PSI F \_\_\_\_\_ R \_\_\_\_\_

LF RF WW BW \_\_\_\_\_

Torque F \_\_\_\_\_ R \_\_\_\_\_

LR RR Discard Tires \_\_\_\_\_

Present Mileage \_\_\_\_\_

Spare Save Tires \_\_\_\_\_

Tire Mileage Warranty \_\_\_\_\_

Old Tire Rotation \_\_\_\_\_

Previous Invoice No. \_\_\_\_\_

Tire Serial # \_\_\_\_\_

Rodriguez, Luz  
Guayama PR 00784  
(939)279-7452

Appointment Time: \_\_\_\_\_

Time Dropped Off: \_\_\_\_\_

Time Promised: \_\_\_\_\_

Cust#: 5103188678 Salesperson: 410773 PO#: \_\_\_\_\_ Date: 3/02/2024 Time: 6:31PM

QTY	SKU/CODE	TECH	DESCRIPTION	PART NO	VEHICLE	PRICE	EXTENDED T
4	11410196		FALKEN 215/70R16 1 E	FAL2157016	1996 TOYOTA RAV4	118.99	475.96 *
4	9801032		WHEEL BALANCE LIFETI	LABOR13	1996 TOYOTA RAV4	14.99	59.96 *
1	82160019		SHOP/DISPOSAL HANDLN	SHOPDISPFEE	1996 TOYOTA RAV4	4.00	4.00 *
4	9806023		ROAD HAZARD - AT SAL	HAZ2	1996 TOYOTA RAV4	13.40	53.60
1	9801016		WHEEL ALIGN 3M/3K	LABOR11	1996 TOYOTA RAV4	43.99	43.99 *

Taxable Total: 583.91

Non Taxable Total: 53.60

State Tax: 61.31

Reduced State Tax: 0.00

Mun. Tax: 5.84

Total: 704.66

\*\*\* THIS IS NOT A RECEIPT \*\*\*

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\*\*\* CUSTOMER COPY \*\*\*

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ATH Movil Transfer	- \$9.00
24 DE FEBRERO DE 24	

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VR GAS STATION	- \$17.50
24 DE FEBRERO DE 24	

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OTHER TRANSACTIONS	- \$17.00
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ESTADO CORRIENTE

EFT DEPOSIT DEPT DE HACIENDA	
REINTEGROS XXXXXXXXXXXX9472	\$2,376.00 >
23 DE FEBRERO DE 2024	

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ATH MOVIL 0714	- \$1.50
23 DE FEBRERO DE 2024	

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GULF MAUNABO SERV STA	- \$10.00 >
23 DE FEBRERO DE 2024	

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ATHM GULF PALO SECO SEA	- \$4.00 >
22 DE FEBRERO DE 2024	

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ATH MOVIL 0571	\$1.00
21 DE FEBRERO DE 2024	

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ATH MOVIL 0714	- \$3.00
21 DE FEBRERO DE 2024	

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